

# EXHIBIT 1

**From:** [Marden, Libby](#)  
**To:** [Beth Wilkins](#)  
**Cc:** [Caritis, Alexandra](#); [Roopal Luhana](#); [Sarah London](#); [Holly Dolejsi](#); [Elyn Hurd](#); [Andrew Kaufman](#); [Uber PW Bellwether](#); [Steven Rotman](#); [Rachel Abrams](#); [Alex Walsh](#); [An Truong](#); [An Truong](#); [Andrew Kaufman](#); [Annie Wanless](#); [Bret Stanley](#); [Brian Abramson](#); [Caitlin Woods](#); [Cesar Garcia](#); [Courtney Megino](#); [Deborah Chang](#); [Elyn Hurd](#); [Floencia Cudos](#); [Geoffrey Spaulding](#); [Holly Dolejsi](#); [Jennifer Kawamura](#); [Jill Kraus](#); [JoAnna Pollock](#); [John Boundas](#); [Kristen Gibbons Feden](#); [Kristen Palumbo](#); [Krystle Noweski](#); [Layne Hilton](#); [Marlene Goldenberg](#); [Martin Neira](#); [Maya Kalonia](#); [Meredith Stratigopoulos](#); [Patrick Gunning](#); [Peter Touschner](#); [Rachel Abrams](#); [Reenee Gangopadhyay](#); [Reilly Dunne](#); [Roopal Luhana](#); [Sam Hoefs](#); [Sara Craig](#); [Sara Peters](#); [Sarah Kim](#); [Sarah London](#); [Steven Cohn](#); [Steven Rotman](#); [Sylvester Rede](#); [Tiffany Ellis](#); [Tiffany Ellis](#); [UberMDLPlaintiffsLiaison@lchb.com](#); [Veronica Stewart](#); [Sara Craig](#); [Wyatt, Geoffrey M.](#); [Bueno, Kim](#); [Levy, Jennifer](#); [Blake, Tara](#); [#Uber KE – Paralegal Team](#)  
**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller  
**Date:** Monday, January 5, 2026 5:04:33 PM  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)

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Beth,

We disagree with your assessment and believe that these reports are proper rebuttal. We look forward to reviewing your PTO draft if you send one.

We are available to take Dr. Chandler's deposition at 11 CT/10 MT on January 11<sup>th</sup>.

Thanks,  
Libby

**Libby Marden**

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**From:** Beth Wilkins <Wilkins@chaffinluhana.com>  
**Sent:** Monday, January 5, 2026 9:02 AM  
**To:** Marden, Libby <libby.marden@kirkland.com>  
**Cc:** Caritis, Alexandra <alexandra.caritis@kirkland.com>; Roopal Luhana <Luhana@chaffinluhana.com>; Sarah London <slondon@girardsharp.com>; Holly Dolejsi <hdolejsi@anapolweiss.com>; Elyn Hurd <ehurd@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Uber PW Bellwether <uberbellwether@peifferwolf.com>; Steven Rotman <srotman@hausfeld.com>; Rachel Abrams <rabrams@peifferwolf.com>; Alex Walsh <awalsh@alexwalshaw.com>; An Truong <atruong@simmonsfirm.com>; An Truong <atruong@simmonsfirm.com>; Andrew Kaufman <akaufman@girardsharp.com>; Annie Wanless

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**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

**This message is from an EXTERNAL SENDER**

Be cautious, particularly with links and attachments.

Libby and all,

We have reviewed the Zgoba and Stodden reports served late on January 2 and request that you withdraw them immediately as they are not responsive to either Chandler or Keller's supplemental reports and are improper rebuttal. If Uber does not agree to withdraw them, we will be filing a motion to strike promptly.

In the interest of everyone's time, including Drs. Zgoba and Stodden, we will not be taking either deposition until after this is resolved. It is not anyone's best use of time or resources to take depositions on opinions that will be withdrawn or stricken.

Beth

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**From:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Sent:** Saturday, January 3, 2026 7:01 PM

**To:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolesji@anapolweiss.com](mailto:hdolesji@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Alex Walsh <[awalsh@alexwalshlaw.com](mailto:awalsh@alexwalshlaw.com)>; An Truong; An Truong <[atruong@simmonsfirm.com](mailto:atruong@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Annie Wanless <[awanless@lchb.com](mailto:awanless@lchb.com)>; Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; Bret Stanley <[bstanley@johnsonlawgroup.com](mailto:bstanley@johnsonlawgroup.com)>; Brian Abramson <[babramson@whlaw.com](mailto:babramson@whlaw.com)>; Caitlin Woods <[cwoods@lchb.com](mailto:cwoods@lchb.com)>; Cesar Garcia <[cesar@changklein.com](mailto:cesar@changklein.com)>; Courtney Megino <[cmegino@walkuplawoffice.com](mailto:cmegino@walkuplawoffice.com)>; Deborah Chang <[deborah@changklein.com](mailto:deborah@changklein.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Florencia Cudos <[fcudos@girardsharp.com](mailto:fcudos@girardsharp.com)>; Geoffrey Spaulding <[spaulding@chaffinluhana.com](mailto:spaulding@chaffinluhana.com)>; Holly Dolejsi <[hdolesji@alexwalshlaw.com](mailto:hdolesji@alexwalshlaw.com)>; Jennifer Kawamura <[jkawamura@lchb.com](mailto:jkawamura@lchb.com)>; Jill Kraus <[jkraus@simmonsfirm.com](mailto:jkraus@simmonsfirm.com)>; JoAnna Pollock <[jpollock@simmonsfirm.com](mailto:jpollock@simmonsfirm.com)>; John Boundas <[jboundas@whlaw.com](mailto:jboundas@whlaw.com)>; Kristen Gibbons Feden <[kfeden@anapolweiss.com](mailto:kfeden@anapolweiss.com)>; Kristen Palumbo <[kpalumbo@girardsharp.com](mailto:kpalumbo@girardsharp.com)>; Krystle Noweski <[Noweski@chaffinluhana.com](mailto:Noweski@chaffinluhana.com)>; Layne Hilton <[lhilton@meyerwilson.com](mailto:lhilton@meyerwilson.com)>; Marlene Goldenberg <[mgoldenberg@nighgoldenber.com](mailto:mgoldenberg@nighgoldenber.com)>; Martin Neira <[mneira@walkuplawoffice.com](mailto:mneira@walkuplawoffice.com)>; Maya Kalonia <[mkalonia@girardsharp.com](mailto:mkalonia@girardsharp.com)>; Meredith Stratigopoulos <[mdrukker@txattorneys.com](mailto:mdrukker@txattorneys.com)>; Patrick Gunning <[patrick@changklein.com](mailto:patrick@changklein.com)>; Peter Touschner <[ptouschner@girardsharp.com](mailto:ptouschner@girardsharp.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Reenee Gangopadhyay <[Gangopadhyay@chaffinluhana.com](mailto:Gangopadhyay@chaffinluhana.com)>; Reilly Dunne <[rdunne@simmonsfirm.com](mailto:rdunne@simmonsfirm.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sam Hoefs <[shoefs@nighgoldenber.com](mailto:shoefs@nighgoldenber.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Sara Peters <[speters@walkuplawoffice.com](mailto:speters@walkuplawoffice.com)>; Sarah Kim <[sarah@changklein.com](mailto:sarah@changklein.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Steven Cohn <[cohn@chaffinluhana.com](mailto:cohn@chaffinluhana.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Sylvester Rede <[srede@anapolweiss.com](mailto:srede@anapolweiss.com)>; Tiffany Ellis <[tellis@peifferwolf.com](mailto:tellis@peifferwolf.com)>; Tiffany R. Ellis; [UberMDLPlaintiffsLiaison@lchb.com](mailto:UberMDLPlaintiffsLiaison@lchb.com); Veronica Stewart <[vstewart@peifferwolf.com](mailto:vstewart@peifferwolf.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>; #Uber KE – Paralegal Team <[Uber\\_KE\\_Paralegal\\_Team@kirkland.com](mailto:Uber_KE_Paralegal_Team@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

Dr. Stodden can start at 10 PT next Friday.

Thanks,  
Libby

**Libby Marden**

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**From:** Marden, Libby

**Sent:** Saturday, January 3, 2026 2:22 PM

**To:** 'Beth Wilkins' <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabels@peifferwolf.com](mailto:rabels@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>; #Uber KE – Paralegal Team <[Uber\\_KE\\_Paralegal\\_Team@kirkland.com](mailto:Uber_KE_Paralegal_Team@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

We are not going to put Dr. Zgoba up for a deposition during trial. If you want to depose her, we need to do that before trial begins. We will assume you do not want to depose her unless we hear otherwise by Monday.

Unfortunately, we have conflicts on our end with doing Dr. Chandler's deposition on 1/9. Is he available 1/10, 1/11, or 1/12?

We can put Dr. Stodden up for a deposition on 1/9 in the morning. Let me check with her on a start time, and I will get back to you shortly.

Thanks,

Libby

**Libby Marden**

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**From:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Sent:** Friday, January 2, 2026 10:44 PM

**To:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>; #Uber KE – Paralegal Team <[Uber\\_KE\\_Paralegal\\_Team@kirkland.com](mailto:Uber_KE_Paralegal_Team@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Libby,

We are not going to take Dr. Zgoba's deposition next week but reserve our right to do so before she is called at trial. We'd prefer to start Dr. Stodden's deposition in the morning on the 9th. As previously mentioned, Dr. Chandler is out of town (traveling out of the country). We will provide dates for his deposition as soon as we are able.

Beth

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**From:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Sent:** Friday, January 2, 2026 2:06 PM

**To:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>; #Uber KE – Paralegal Team <[Uber\\_KE\\_Paralegal\\_Team@kirkland.com](mailto:Uber_KE_Paralegal_Team@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

Following up on this. Please let me know on both topics today.

Thanks,

Libby

**Libby Marden**

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**From:** Marden, Libby

**Sent:** Wednesday, December 31, 2025 9:31 AM

**To:** 'Beth Wilkins' <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; 'Roopal Luhana' <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; 'Sarah London' <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; 'Holly Dolejsi' <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; 'Ellyn Hurd' <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; 'Andrew Kaufman' <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; 'Uber PW Bellwether' <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; 'Steven Rotman' <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; 'Rachel Abrams' <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; 'Uber MDL Discovery Team' <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; 'Sara Craig' <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>; #Uber KE – Paralegal Team <[Uber\\_KE\\_Paralegal\\_Team@kirkland.com](mailto:Uber_KE_Paralegal_Team@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

In light of Dr. Chandler's inclusion on the most recent witness list, can you please provide dates for Dr. Chandler's deposition? Please also let us know which start times you want from the below so that Drs. Stodden and Zgoba can block the time on their calendars.

Thanks,

Libby

**Libby Marden**

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**From:** Marden, Libby

**Sent:** Tuesday, December 30, 2025 6:17 PM

**To:** 'Beth Wilkins' <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven

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**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Hi Beth,

We will have two rebuttal reports, one from Dr. Stodden and one from Dr. Zgoba. Both can sit for a deposition on 1/9. Since Dr. Zgoba is on the East Coast, can we start her in the morning, at either 9 ET/6 PT or 10 ET/7 PT? Since Dr. Stodden is on the West Coast, can we start her in the afternoon, at either 3 ET/12 PT or 4 ET/1 PT?

Thanks,  
Libby

**Libby Marden**

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**From:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Sent:** Tuesday, December 30, 2025 3:09 PM

**To:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>; #Uber KE – Paralegal Team <[Uber\\_KE\\_Paralegal\\_Team@kirkland.com](mailto:Uber_KE_Paralegal_Team@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Libby,

We plan to depose Uber's rebuttal expert on 1/9 by Zoom. Please let us know what time you'd like to get started on the 9<sup>th</sup>.



Thank you,  
Beth

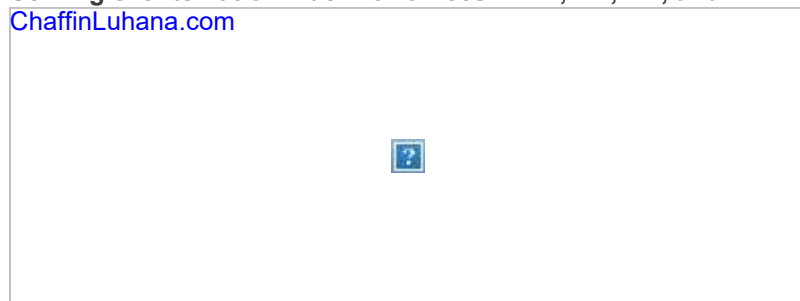
**Beth Wilkins | Partner**

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**Sent:** Monday, December 22, 2025 2:12 PM

**To:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>; #Uber KE – Paralegal Team <[Uber\\_KE\\_Paralegal\\_Team@kirkland.com](mailto:Uber_KE_Paralegal_Team@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Counsel,

Attached please find a deposition notice for Ms. Keller. As mentioned previously, we will need to have rebuttal reports due on 1/6 to incorporate this information and will offer our rebuttal expert(s), if any, for deposition between 1/7-1/9.

Thank you,  
Libby

**Libby Marden**

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**From:** Marden, Libby

**Sent:** Saturday, December 20, 2025 10:22 AM

**To:** 'Beth Wilkins' <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermdldiscovery@chaffinluhana.com](mailto:ubermdldiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

We will issue a notice for Ms. Keller's deposition on 1/5. If Dr. Chandler is coming to trial, we want to depose him before he takes the stand. If you are not willing to tell us now, we will revisit this on 12/30 after receipt of your witness list.

Thanks,  
Libby

**Libby Marden**

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**From:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>  
**Sent:** Saturday, December 20, 2025 12:29 AM  
**To:** Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>  
**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>  
**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

We will hold 1/5 for Ms. Keller. Per the parties' agreement, the next updated witness list is to be exchanged on 12/30. Please let us know if you'd like to depose Dr. Chandler. He is unavailable the first two weeks of January and may now have a conflict on 12/31.

**Beth Wilkins | Partner**

**E:** [Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)

**P:** [\(412\) 643-0290](tel:(412)643-0290)

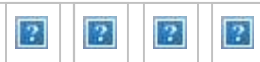
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**Sent:** Friday, December 19, 2025 9:20 AM  
**To:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>  
**Cc:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>; Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>; Blake, Tara <[tara.blake@kirkland.com](mailto:tara.blake@kirkland.com)>  
**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

We only want to depose Dr. Chandler if he's going to be called at trial. If you don't know whether he will testify at this time, we will depose him once you make that decision. Regarding length of depositions, we will agree to three hours for Dr. Chandler's deposition (should you decide that he will be called to trial). We can tentatively agree to three hours for Keller, however, as you know, we had problems in Dr. Keller's prior deposition with her refusal to directly respond to questions and giving very lengthy answers to questions other than those that were asked. So while we are willing to try to complete the supplemental deposition in three hours, we reserve the right to seek additional time, including through court intervention, if we are unable to get direct answers to questions.

We can take Dr. Keller's deposition on 1/5 at 8 PT. We will need to have rebuttal reports due on 1/6 to incorporate this information and will offer our rebuttal expert(s), if any, for deposition between 1/7-1/9.

Thanks,  
Libby

**Libby Marden**

---

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**From:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>  
**Sent:** Wednesday, December 10, 2025 12:57 PM  
**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi

<[hdolesi@anapolweiss.com](mailto:hdolesi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>

**Cc:** Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Alex,

Plaintiffs will comply with the schedule set by PTO 8 and expect both parties to strictly comply with the schedule laid out by paragraph 3, including an exchange of drafts by 3 pm PT on Friday and filing by 5 pm PT. We do not agree to more than 3 hours for Keller or Chandler. Keller is not available on 12/18 or 12/22. We will get back to you regarding your questions about Chandler.

Beth

**Beth Wilkins | Partner**

**E:** [Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)

**P:** (412) 643-0290

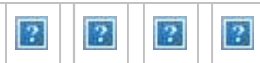
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**Cc:** Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>; Bueno, Kim <[kim.bueno@kirkland.com](mailto:kim.bueno@kirkland.com)>; Levy, Jennifer <[jlevy@kirkland.com](mailto:jlevy@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Beth,

We will share our PTO8 sections on Monday and request your responses Thursday for filing Friday.

Concerning the depositions, we will agree to 3 hours for Chandler (pursuant to my note below) if you agree to 5 hours for Dr. Keller.

As to dates, is Dr. Keller available 12/18 or 12/22?

We see that Pl has identified Dr. Chandler as a “may call.” Please provide us a date certain when you will know whether Chander will be called at the Dean trial and potential deposition dates 3-4 dates after that if he is coming to trial.

Thank you.

**Alexandra Caritis**

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**From:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Sent:** Tuesday, December 9, 2025 12:01 PM

**To:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>; Roopal Luhana <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; Sarah London <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; Holly Dolejsi <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; Ellyn Hurd <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; Andrew Kaufman <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; Uber PW Bellwether <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; Steven Rotman <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; Rachel Abrams <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; Uber MDL Discovery Team <[ubermlddiscovery@chaffinluhana.com](mailto:ubermlddiscovery@chaffinluhana.com)>; Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>

**Cc:** Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Alex,

The supplements to the Keller and Chandler reports all tie to Uber's withholding of and extremely delayed production of the Flack data. We do not agree to pull down any portion of either report. We will agree to a 3-hour deposition for each expert if Uber agrees to the same for Uber's rebuttal experts. Ms. Keller is available for her supplemental deposition on December 23 or January 5. We are working on dates for Dr. Chandler.

Beth

**Beth Wilkins | Partner**

**E:** [Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)

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Sara Craig <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>

**Cc:** Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

All,

Following-up on the below. Can you please let us know your position and whether it would be helpful to discuss? If we are briefing this issue, we will need to do it soon.

Thanks.

**Alexandra Caritis**

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**From:** Caritis, Alexandra

**Sent:** Friday, December 5, 2025 4:01 PM

**To:** 'Beth Wilkins' <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>; 'Roopal Luhana' <[Luhana@chaffinluhana.com](mailto:Luhana@chaffinluhana.com)>; 'Sarah London' <[slondon@girardsharp.com](mailto:slondon@girardsharp.com)>; 'Holly Dolejsi' <[hdolejsi@anapolweiss.com](mailto:hdolejsi@anapolweiss.com)>; 'Ellyn Hurd' <[ehurd@simmonsfirm.com](mailto:ehurd@simmonsfirm.com)>; 'Andrew Kaufman' <[akaufman@girardsharp.com](mailto:akaufman@girardsharp.com)>; 'Uber PW Bellwether' <[uberbellwether@peifferwolf.com](mailto:uberbellwether@peifferwolf.com)>; 'Steven Rotman' <[srotman@hausfeld.com](mailto:srotman@hausfeld.com)>; 'Rachel Abrams' <[rabrams@peifferwolf.com](mailto:rabrams@peifferwolf.com)>; 'Uber MDL Discovery Team' <[ubermdldiscovery@chaffinluhana.com](mailto:ubermdldiscovery@chaffinluhana.com)>; 'Sara Craig' <[scraig@peifferwolf.com](mailto:scraig@peifferwolf.com)>

**Cc:** Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

All,

Thanks for the call earlier today. As we discussed, attached are annotated reports identifying the sections of the reports that do not relate to the October Flack productions and related deposition.

We look forward to hearing from you and are hopeful we can resolve this dispute without further briefing. We're happy to get on another call to discuss.

Thanks.

**Alexandra Caritis**

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**From:** Caritis, Alexandra

**Sent:** Friday, December 5, 2025 10:36 AM

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**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Thanks, I'll send an invite.

**Alexandra Caritis**

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**From:** Beth Wilkins <[Wilkins@chaffinluhana.com](mailto:Wilkins@chaffinluhana.com)>

**Sent:** Friday, December 5, 2025 8:48 AM

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**Cc:** Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Subject:** RE: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

Hi Alexandra. We can be available at 11 PT today.

Beth

**Beth Wilkins | Partner**

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*A referral is the best compliment. If you know anyone who needs our help, please have them call us. We're available 24/7.*

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**From:** Caritis, Alexandra <[alexandra.caritis@kirkland.com](mailto:alexandra.caritis@kirkland.com)>

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**Cc:** Wyatt, Geoffrey M. <[geoffrey.wyatt@kirkland.com](mailto:geoffrey.wyatt@kirkland.com)>; Marden, Libby <[libby.marden@kirkland.com](mailto:libby.marden@kirkland.com)>

**Subject:** FW: Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

All,

We would like to meet and confer tomorrow morning concerning the Keller and Chandler reports served late Tuesday.

Please let us know your availability between 8-11PT.

Thanks.

**Alexandra Caritis**

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**From:** UberMDLService <[UBERMDLSERVICE@LISTSERV.SHB.COM](mailto:UBERMDLSERVICE@LISTSERV.SHB.COM)> **On Behalf Of** Tiffany R. Ellis  
**Sent:** Wednesday, December 3, 2025 2:20 AM  
**To:** [UBERMDLSERVICE@LISTSERV.SHB.COM](mailto:UBERMDLSERVICE@LISTSERV.SHB.COM)  
**Subject:** Uber MDL 3084 - Updated Plaintiff Expert of Lacey Keller

**EXTERNAL**

Counsel:

At the following link you may download the updated report of Lacey Keller including all exhibits and/or attachments except those in the BDO environment.

[Keller 12.02.25 Supplemental Report \(link shared with Ds\)](#)

The password will follow under a separate cover.

If the report is marked confidential, we reserve the right to de-designate any of our expert reports that do not, in fact, contain such material, and will advise you of any such de-designation.

**Tiffany R. Ellis**  
Partner



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